



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

OCT 28 2002

Mr. Hector Alvarez
CSAV Group DG Dept
SudAmericana de Vapores
Plaza Sotomayor 50
Valparaiso CHILE

Ref. No. 01-0307

This responds to your letter regarding the alternative use of the description "Dangerous goods in limited quantities of class/classes" in lieu of the proper shipping name on a shipping paper or dangerous cargo manifest for dangerous goods shipped in excepted or limited quantities in accordance with Paragraph 3.4.6.2 of the International Maritime Dangerous Goods (IMDG) Code. I apologize for the delay in responding and hope it has not caused any inconvenience.

Two separate combination packagings contain dangerous goods of certain classes packaged in limited quantities. One fiberboard box contains 12 cans of three different materials in Class 3, with different UN numbers described as: "Dangerous goods in limited quantities of Class 3, UN 1263, UN 1993, and UN 1268, PG III", and the other fiberboard box contains 12 cans of both Class 3 and Class 8 materials with different UN numbers described as: "Dangerous goods in limited quantities of Classes 3 and 8, UN 1263, UN 1993, and UN 1805, PG III." The materials are compatible with each other.

With certain exceptions, if all or part of the transportation is by vessel, a hazardous material which is classed, packaged, marked, labeled, placarded and described in accordance with the requirements of the IMDG Code may be offered and accepted and transported in the United States (See § 171.12(b)). Paragraph 3.4.6.2 of the IMDG Code allows the description "Dangerous goods in limited quantities of class/classes ..." to be used on the transport document or shipping paper instead of the proper shipping name for the material. The UN number(s) and packing group(s) of all materials in the packages must be included as part of the description. For example, the description could be shown as "Dangerous goods in classes 3 and 8, UN XXXX, UN XXXX, UN XXXX, PG II, PG III, PG III".

The IMDG Code does not specify how using the alternative description for several compatible hazardous materials should be shown, although Paragraph 5.4 specifies that the description must be legible and in the sequence as prescribed in Paragraph 5.4.1.1.1 of the IMDG Code. For your



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information, in the near future, Amendment 31 to the IMDG Code will remove the option to use the alternative description, specified in Paragraph 3.4.6.2, for hazardous materials shipped in limited quantities in accordance with the IMDG Code.

I hope this satisfies your inquiry.

Sincerely,

A handwritten signature in cursive script, appearing to read "Delmer F. Billings".

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



Engrum
3172.101
Proper Shipping
Name
01-0307

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/RSPA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

Valparaiso, 3rd. December, 2001

Dear Mr. Mazzullo:

The 30th. amendment to the IMDG Code (Chapter 3.4) accepts as Proper Shipping Name the sentence "dangerous goods in limited quantities of the class/classes..."

This Proper Shipping Name may be used as the mark on the package.

By adding the UN number and the Packing Group may be used to describe the material in the documents.

By "package" shall be understood the outer packaging containing the inner packagings filled with the material in limited quantities.

This package may contain several materials provided that they comply with the segregation criteria set forth in Chapter 7.2.

One fibreboard box with 12 cans containing 3 different UN numbers, all class 3, all compatible may be described as:

"Dangerous goods in limited quantities of the class 3, UN1263, UN1993, UN1268, PG III"

One fibreboard box with 12 cans containing 3 different UN numbers, classes 3 and 8, all compatible may be described as:

"Dangerous goods in limited quantities of the classes 3 and 8, UN1263, UN1993, UN1805, PG III"

The above refers to one package with compatible materials.

If we offer 2 fibreboard boxes, one with assorted classes 3 and the other one with assorted classes 8, the above description shall not be used. It needs to be declared separately, i.e.

1 fibreboard box Dangerous goods in limited quantities of the class 3, UN1263, UN1993, UN1268, PG III

1 fibreboard box Dangerous goods in limited quantities of the class 8, UN1824, UN1805, PG III

I am of the opinion that "2 fibreboard boxes with Dangerous goods in limited quantities of the classes 3 and 8, UN1263, UN1993, UN1268, UN1824, UN1805, PG III" does not provide the same information.

Do you agree with this interpretation?

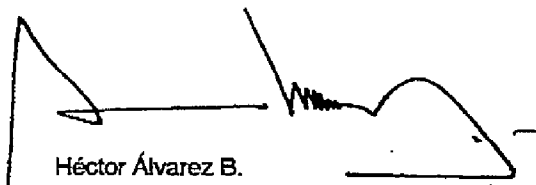
Following with the above, I have listed on purpose all materials as being PG III, what about if they are PG II and PG III. How do I describe this condition?

"1 fibreboard box Dangerous goods in limited quantities of the class 3, UN1263 and UN1993, PG III. PG II"?

Another question: How do I advise the additional information for the UN1993 in this case?

"1 fibreboard box Dangerous goods in limited quantities of the class 3, UN1263 and UN1993 (acetone), PG III. PG II"?

I look forward to receive your advise on this subject that with mixed loads in a single container could become a nightmare.



Héctor Álvarez B.

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